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Reply to Office Action of September 27, 2006

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REMARKS/ARGUMENTS

I.   Status of the Claims

      Prior to entry of this amendment, claims 1-12, 14-27, 29-34 and 36-46 are currently pending. An office action mailed September 27, 2006 rejected claims 1-12, 14-27, 29-34 and 36-45 under 35 U.S.C. § 103(a) as being unpatentable over USP 6,968,503 to Chang et al. (hereinafter, "Chang"), in view of USP 6,986,138 to Sakaguchi et al. (hereinafter "Sakaguchi"). The office action also rejected claim 46 under § 103(a) as being unpatentable over the combination of Chang and Sakaguchi, in further view of USP 6,457,066 to Mein et al. (hereinafter, Mein"). This amendment amends claims 34 and 36-39, and neither adds, nor cancels any claims. Hence, after entry of this amendment, claims 1-12, 14-27, 29-34 and 36-46 will remain pending for examination.

II.   Claim Amendments

      Claims 34 and 36-39 have been amended for consistency with claim 33, from which they depend.

III.   Claim Rejections under 35 U.S.C. §103

      The office action rejected claims 1-12, 14-27, 29-34 and 36-45 under § 103(a) as being unpatentable over the combination of Chang and Sakaguchi. However, for at least the reasons discussed below, the combination of Chang and Sakaguchi fails to teach or suggest each element of even independent claims 1, 22 and 33. Accordingly, these claims are believed to be allowable over the cited combination. Claims 2-12, 14-21, 23-27, 29-32, 34 and 36-45 are believed to be allowable at least by virtue of their dependence from allowable base claims.

      Consider, for example, claim 1. In rejecting claim 1, the office action relies principally on Chang. However, as pointed out in the amendment filed June 23, 2006, Chang fails to disclose multiple elements of claim 1. Specifically, Chang fails to teach or suggest, inter alia, "an access management system accessing a template that indicates parameters for defining workflows," as recited by claim 1. Nor does Chang teach or suggest "creating a definition of a

first workflow for managing at least one identity of at least one entity, based on said template,"
also as recited by claim 1. The office action admits that Chang fails to disclose an access
management system, but it asserts that columns 21-29 of Chang disclose both accessing a
template that indicates parameters for defining workflows and creating a definition of a first
workflow for managing at least one identity of at least one entity, based on a template. The
disclosure in those columns, however, has nothing to do with either of the claimed elements.
Rather, those columns simply describe various XML tags that are available in the system of
Chang. In particular, the cited portion of Chang not fails to disclose creating a workflow
definition from a template, it fails even to disclose a workflow template itself.

Indeed, Chang teaches that the workflows executed by the workflow server are
defined by the commands entered by the user. See Chang, c. 1, ll. 61-67 ("The Workflow Server
passes a <u>user command</u> to an XML Execution Engine, accesses an XML namespace to determine
how to execute said command, executes said command, accessing a database, if necessary, and
returns an XML document back to user for display on the user's web browser . . . ." (emphasis
added). Admittedly, Chang does mention the word "template" and discloses a tag that "returns
template related information." (Col. 21, lines 59-67) However, the "templates" referred to in
Chang are XSL templates (col. 6, lines 1-5) for identifying a stylesheet to be used to display the
workflow results to the requesting user via his browser (col. 3, line 62 - col. 4, line 4). They are
<u>not</u> workflow definition templates, however, and as such, are of no relevance to claim 1. In other
words, Chang's "TEMPLATE-TAG" does not relate to a template that indicates parameters for
defining workflows. Accordingly, Chang fails to teach or suggest multiple elements for which it
is cited.

Moreover, Sakaguchi does not, as the office action posits, teach or suggest an
access management system. In arguing that Sakaguchi teaches this element, the office action
misstates the language of that claim. Specifically, the office action states that "Sakaguchi
teaches an access management system comprising an identity system for managing identity
profiles, and an access system for providing security of resources across one or more servers . . .
." Office Action, at 3. The claim, however, recites that the "access management system

compris[es] identity system for managing identity profiles and an access system for providing

security of resources across <u>one or more web servers</u>" (emphasis added).

This oversight is critical, because Sakaguchi, to the extent it teaches any access

management at all, teaches only the management of access to the workflows themselves, not to

any web servers. For example, the office action posits that column 7, lines 31-48 and column 12,

lines 61-67 of Sakaguchi teach the recited access management features. Those passages,

however, clearly teach only the control of access to information about the workflow itself. The

passage in column 12, for instance, specifically states, "Next, it is checked if the corresponding

virtual node to the obtained node has an access right to the progress information (step 1008). . . .

If the virtual node has an access right, the obtained virtual workflow node ID is made to be the

progressing stated that is processed result (step-1010)." Sakaguchi, col. 12, ll. 61-67. Similarly,

the passage in column 7 discloses that "[t]he display right 3361 stores the presence or the

absence of the operation right of publication of the virtual workflow node to a user (client). The

inquiry right 3381 stores the presence or the absence of the operation right of the inquiry on the

progress of the node by the user. The input right 3391 stores the presence or the absence of the

operation right of the execution information input at the node." Id., col. 7, ll. 37-42. Clearly,

neither of these passages teach an access management system that "provid[es] security of

resources across on or more web servers," as recited by claim 1.

Hence, neither Chang nor Sakaguchi teaches or suggests the access management

system recited by claim 1, so even if those references did happen to teach the other elements of

claim 1 (which they do not), claim 1 still would be allowable over the combination of Chang and

Sakaguchi.

Moreover, the office action has shown no motivation or suggestion to combine

the references, as required for a proper rejection under § 103(a). *See* MPEP § 2142. The office

action states that "[i]t would have been obvious . . . to combine the teachings of Chang regarding

a workflow server with the teachings of Sakaguchi regarding managing access in a workflow

system because different users may require different levels of access to a workflow." Office

Action, at 3. Assuming this statement is true, it provides no motivation to combine Chang with

Sakaguchi, since Chang already provides access management for workflows. For example,

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column 21, lines 9-18 of Chang describes an access matrix that defines access rights to various workflow components. Because Chang already provides for workflow access management (but not, it should be noted, security for any web servers), there is no motivation or suggestion to combine Sakaguchi with Chang to provide this functionality.

Accordingly, even if Chang and Sakaguchi did teach each element of claim 1 (which, for at least the reasons noted above, they do not), Chang and Sakaguchi still could not be combined to establish a prima facie argument that claim 1 is unpatentable.

Claims 22 recites a processor readable storage device with processor readable code executable by an access management system, and claim 33 recites an access management system. Claims 22 and 33 each include elements substantially similar to those recited by claim 1, and they are believed to be allowable for at least similar reasons. Dependent claims 2-12, 14-21 and 40-46 ultimately depend from claim 1, while claims 23-27 and 29-32 each ultimately depend from claim 22, and claims 34 and 36-39 each depend, either directly or indirectly, from claim 33. These dependent claims are believed to be allowable at least by virtue of their dependence from allowable base claims.

In addition, however, several of the dependent claims recite additional novel features not taught or suggested by any of the cited references. Merely by way of example, claim 40 recites "wherein the workflow performs a task selected from the group consisting of: creating a user, deleting a user, subscribing a user to a group, enrolling a certificate, renewing a certificate, revoking a certificate, and changing a user attribute." The office action cites lines 50-67 of Chang as teaching this element. That passage, however, teaches none of these operations. Instead, the cited passages teaches merely the setting of a context for each request. (It should be noted, for example, that Chang does not teach creating a user, because, as noted in prior amendments, Chang does not teach user management – instead, Chang merely describes a workflow for managing a patient's treatment, and the patient cannot be considered a user of any computer system associated with Chang.)

Nor does Chang teach the elements of claim 43, which recites, inter alia, "a client program performing one or more of the actions." Chang clearly teaches that the "workflow system" performs the requested actions. See Chang, col. 1, lines 53-67. The office action cites

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Fig. 2, which does show a client browser, but neither Fig. 2 nor the associated description provides any disclosure that the client browser might perform any workflow actions. Similarly, because Chang fails to teach a client program performing any actions, it necessarily fails to teach the elements of claim 44, which recites, inter alia, "upon completion of the one or more actions, the client program invoking the callback URL."

For at least these additional reasons, claims 40, 43, 44, and 45 are believed to be allowable over the cited combination of Chang and Sakaguchi

Claim 46 was rejected under § 103(a) as being unpatentable over Chang and Sakaguchi, in view of Mein. Mein, however, fails to correct the deficiencies of Sakaguchi and Chang, as described above. Hence, because claim 46 ultimately depends from claim 1, it is believed to be allowable at least because of that dependence.

CONCLUSION

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Dated: December 27, 2006

Respectfully submitted,

/Chad E. King/
Chad E. King
Reg. No. 44,187

TOWNSEND and TOWNSEND and CREW LLP
Two Embarcadero Center, Eighth Floor
San Francisco, California 94111-3834
Tel: 303-571-4000 (Denver office)
Fax: 303-571-4321 (Denver office)

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